

PRESS RELEASE

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TWO HO-CHUNK PATRONS GUILTY OF SCHEME TO STEAL \$10,000

Madison, Wisconsin -- Erik C. Peterson, United States Attorney for the Western District of Wisconsin, announced that Bruce Knutson, 57, and Darwin Moore, 59, both of Menasha, Wisconsin, were convicted by Chief U.S. District Judge Barbara B. Crabb yesterday, following a one-day trial on June 18, 2007, in federal court in Madison. Both men were found guilty of conspiracy to steal money belonging to a gaming casino operated by an Indian tribe.

Judge Crabb scheduled sentencing for November 16, 2007, at 1:20 p.m. Both men face a maximum penalty of ten years in prison and a \$250,000 fine.

In a written opinion and order issued yesterday, Judge Crabb found that Knutson and Moore conspired to steal money from Ho-Chunk Casino in its 2005 Tax Times Blues Giveaway which promised prizes totaling \$50,000 to be given out over a five-hour time span on April 14, 2005. Judge Crabb found that Knutson and Moore submitted 9355 counterfeit entry forms in the contest, in contravention of the contest rules. According to the written opinion and order, defendant Moore purchased four

reams of bright orange paper from CopyMax to match the color of the real entry forms, and photocopied the forms along with Knutson at their apartment in Menasha. The two of them then made repeated trips to Ho-Chunk Casino and made multiple submissions of the counterfeit entry forms into the contest barrel. Judge Crabb also found that Knutson and Moore used two accomplices to help submit additional forms into the contest barrel on the last day of the drawing.

Judge Crabb rejected the defendants' argument that they did not act with an intent to steal from Ho-Chunk Casino because the contest rules were vague. Judge Crabb wrote the following in her opinion and order:

One can infer from their actions that they knew their actions were illegal. Why else would they have taken care to make their entry forms look exactly like the casino's own forms, filled out a few forms at the casino to make it appear that their walks to the barrel were for legitimate purposes or been so furtive about dropping their stacks of counterfeit entries into the barrels? Why else would they have engaged accomplices to help stuff the barrels and not have told the accomplices what they were doing? Why else would they have thought themselves safe in telling Agent Glaman that they received the entry forms from other visitors to the casino or picked up discards at the casino but refused to admit they had made their own copies? In counterfeiting and submitting the entry forms, defendants were acting with the intent to deprive the Ho-Chunk nation of the rights and benefits of ownership of its funds, which included its right to award its funds as prizes to persons who complied with the rules of its promotion. Any question about their intent is answered by defendants' surreptitious conduct in submitting their counterfeit forms and their denial of copying when they spoke with Agent Glaman.

The charges against Knutson and Moore were the result of an investigation conducted by the Wisconsin Department of Justice, Division of Criminal Investigation-Gaming Enforcement Bureau. The prosecution of the case has been handled by Assistant U.S. Attorney Daniel J. Graber.